

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PUREWICK CORPORATION,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
v.)	C.A. No. 19-1508-MN
)	
SAGE PRODUCTS, LLC,)	
)	
Defendant/Counterclaim Plaintiff.)	

**PLAINTIFF’S MOTION TO PRECLUDE UNTIMELY INVALIDITY OPINIONS OF
DONALD SHELDON AND DIANE NEWMAN**

Pursuant to Fed. R. Civ. P. 37(b)(2)(A) and/or 37(c)(1), Plaintiff PureWick Corporation (“PureWick” or “Plaintiff”) hereby moves to preclude Sage experts Donald Sheldon and Diane Newman from offering invalidity opinions at trial that rely on references or theories that were not timely disclosed pursuant to the Court’s orders. The grounds for PureWick’s Motion are fully set forth in Plaintiff’s Opening Brief.

NOW, THEREFORE, Plaintiff PureWick Corporation respectfully requests the Court to enter the proposed order attached as Exhibit A granting this motion.

OF COUNSEL:

Steven C. Cherny
Brian P Biddinger
Matthew A. Traupman
Nicola R. Felice
Jason C. Williams
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Ave., 22nd Floor
New York, NY 10010
(212) 849-7000

Athena Dalton
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
(312) 705-7400

Dated: September 20, 2021

/s/ John W. Shaw

John W. Shaw (No. 3362)
Andrew E. Russell (No. 5382)
David M. Fry (No. 5486)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
arussell@shawkeller.com
dfry@shawkeller.com
Attorneys for Plaintiff